

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

MALLINCKRODT PLC, *et al.*,

Reorganized Debtors.¹

Chapter 11

Case No. 20-12522 (JTD)

Jointly Administered

Heather L. Barlow as Trustee of the MALLINCKRODT
GENERAL UNSECURED CLAIMS TRUST,

Plaintiff,

V.

MAXCARE LLC D/B/A MAXCARE RX.

Defendant.

Adv. Case No. 22-50429 (JTD)

Adv. Pro. No. 22-50435 (JTD)

OPIOID MASTER DISBURSEMENT TRUST II,

Plaintiff,

V.

ARGOS CAPITAL APPRECIATION MASTER FUND)
LP; BARCLAYS CAPITAL, INC.; BEC CAPITAL LLC;)
BLACKROCK INSTITUTIONAL TRUST COMPANY,)
N.A. (UK BRANCH); BLACKROCK)
INTERNATIONAL LIMITED; BLACKSTONE)
SENFINA ADVISORS LLC; BLUE RIDGE CAPITAL)
HOLDINGS LLC; BLUE RIDGE CAPITAL LLC;)
CAPITAL FUND MANAGEMENT SA; CAPITAL)
GROWTH MANAGEMENT LIMITED PARTNERSHIP;)
CARLSON CAPITAL LP; CHESTER DRIVE CAPITAL)
LP; CHIMERA SECURITIES LLC; CITADEL)
SECURITIES LLC; CLEAR STREET MARKETS LLC)

¹ A complete list of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors' claims and noticing agent at <http://restructuring.ra.kroll.com/Mallinckrodt>. The Reorganized Debtors' mailing address is 675 McDonnell Blvd., Hazelwood, Missouri 63042.

a/k/a SUMMIT SECURITIES GROUP LLC;)
 CONSONANCE CAPITAL MANAGEMENT LP;)
 CUTLER GROUP LLC a/k/a CUTLER GROUP LP; D.E.)
 SHAW ASYMPTOTE PORTFOLIOS LLC; D.E. SHAW)
 VALENCE PORTFOLIOS LLC; DEUTSCHE BANK)
 AG; EG MARKET TECHNOLOGIES LLC; ELEMENT)
 CAPITAL MANAGEMENT LLC; ENGINEERS GATE)
 MANAGER LP; ERGOTELES LLC; EVERPOINT)
 ASSOCIATES LLC; G1 EXECUTION SERVICES LLC;)
 GF TRADING LLC; GTS SECURITIES LLC;)
 HEALTHCOR MANAGEMENT LP; HEHMEYER LLC;)
 HOPLITE CAPITAL LLC; HRT EXECUTION)
 SERVICES LLC; HRT EXECUTION SERVICES, LLC)
 a/k/a SUN TRADING LLC; HRT FINANCIAL LP; HRT)
 FINANCIAL L P a/k/a HRT FINANCIAL LLC; IMC-)
 CHICAGO LLC d/b/a IMC FINANCIAL MARKETS;)
 JANE STREET CAPITAL LLC; JUMP TRADING LLC;)
 KOREA INVESTMENT CORPORATION; LATOUR)
 TRADING LLC; LION CAVE CAPITAL LLC; LION)
 CAVE MANAGEMENT LLC; MERRILL LYNCH,)
 PIERCE, FENNER & SMITH INCORPORATED;)
 MOORE CAPITAL MANAGEMENT LP; PALOMINO)
 LIMITED; PAULSON & CO., INC.; PFM HEALTH)
 SCIENCES LP a/k/a PARTNER FUND MANAGEMENT)
 LP; POTAMUS HOLDINGS LLC a/k/a POTAMUS)
 TRADING LLC; QUANTBOT MANAGEMENT)
 MASTER FUND SPC LTD; QUANTITATIVE)
 INVESTMENT MANAGEMENT LLC; QUANTLAB)
 SECURITIES LP; QUANTLAB TRADING PARTNERS)
 US LP; RESILIENT CAPITAL LLP; RGM SECURITIES)
 LLC; RIEF RMP LLC; RIEF TRADING LLC; ROCK)
 CREEK MB LLC; SIMPLEX TRADING LLC; SPIRE X)
 TRADING LLC; SQUAREPOINT OPS LLC;)
 SUSQUEHANNA SECURITIES LLC; SVB)
 SECURITIES LLC a/k/a LEERINK PARTNERS LLC; T.)
 ROWE PRICE ASSOCIATES, INC., AND JOHN DOE)
 FUNDS; T3 TRADING GROUP LLC; TEWKSBURY)
 INVESTMENT FUND LTD; THESYS TECHNOLOGIES)
 LLC; TOWER RESEARCH CAPITAL LLC;)
 TRADEBOT SYSTEMS, INC.; TRILLIUM TRADING)
 LLC; VA MANAGEMENT LP a/k/a VISIUM ASSET)
 MANAGEMENT LP; VIRTU AMERICAS LLC a/k/a)
 KCG AMERICAS LLC; VIRTU AMERICAS, LLC a/k/a)
 VIRTU FINANCIAL BD LLC; WILLIAM BLAIR &)
 COMPANY LLC; XTX MARKETS LLC, and JOHN)
 DOE DEFENDANTS, and)

HRT FINANCIAL LP, PAULSON & CO., INC. and)
CUTLER GROUP LP on behalf of themselves and a class)
of similarly situated persons and legal entities,)
)
Defendants.)

**NOTICE OF *AMENDED*² AGENDA FOR HEARING
SCHEDULED FOR DECEMBER 20, 2022 AT 10:00 A.M.³ (PREVAILING
EASTERN TIME), BEFORE THE HONORABLE JOHN T. DORSEY AT THE
UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE⁴**

**THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM
AND REQUIRES ALL PARTICIPANTS TO REGISTER IN ADVANCE.
COURTCALL WILL NOT BE USED TO DIAL IN.**

PLEASE USE THE FOLLOWING LINK TO REGISTER FOR THE HEARING:

<https://debuscourts.zoomgov.com/meeting/register/vJIsd-ChqjLiGc4allctBA4j5T9TiESPsN4>

**ONCE REGISTERED, PARTIES WILL RECEIVE AN EMAIL CONTAINING PERSONAL
LOG-IN INFORMATION FOR THE HEARING.**

I. RESOLVED ADVERSARY MATTER [ADV. CASE NO. 22-50429 (JTD)]:

1. Pretrial Conference in *Heather L. Barlow as Trustee of the Mallinckrodt General Unsecured Claims Trust v. MaxCare LLC d/b/a MaxCare RX*, Adversary Case No. 22-50429 (JTD)

Related Documents:

- i. Complaint for Avoidance and Recovery of Preferential Transfers and Objection to Claims [[Adv. Docket No. 1](#) – filed October 4, 2022]
- ii. Summons and Notice of Pretrial Conference in an Adversary Proceeding [[Adv. Docket No. 2](#) – filed October 4, 2022]
- iii. Answer of Defendant MaxCare LLC d/b/a MaxCare RX [[Adv. Docket No. 4](#) – filed October 31, 2022]

² Amended items appear in bold.

³ At the direction of Chambers, the hearing will begin at 10:00 a.m. (prevailing Eastern time).

⁴ All motions and other pleadings referenced herein are available online at the following address: <http://restructuring.primeclerk.com/Mallinckrodt>.

Status: This matter has been settled, subject to documentation. Accordingly, the pretrial conference with respect this matter is no longer necessary.

II. MATTER SUBMITTED UNDER CERTIFICATION:

2. Reorganized Debtors' Fourteenth Omnibus Objection to Certain Claims (Substantive) [[Docket No. 8375](#) – filed November 16, 2022]

Objection/Response Deadline: December 7, 2022 at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Notice of Submission of Copies of Proofs of Claim Regarding Reorganized Debtors' Fourteenth Omnibus Objection to Certain Claims (Substantive) [[Docket No. 8387](#) – filed December 6, 2022]
- ii. Certificate of No Objection Regarding Reorganized Debtors' Fourteenth Omnibus Objection to Certain Claims (Substantive) [[Docket No. 8393](#) – filed December 8, 2022]
- iii. **Order Sustaining Reorganized Debtors' Fourteenth Omnibus Objection to Claims (Substantive)** [[Docket No. 8435](#) – entered December 19, 2022]

Status: On December 19, 2022, the Court entered an order resolving this matter. Accordingly, a hearing with respect this matter is no longer necessary.

III. MATTERS GOING FORWARD:

3. Opioid Master Disbursement Trust II's Motion to Compel Production Pursuant to Subpoena and Document Requests [related to J.P. Morgan Securities LLC] [[Docket No. 8379](#) – filed November 18, 2022]

Objection/Response Deadline: December 2, 2022 at 4:00 p.m. (ET); extended to December 13, 2022 at 4:00 p.m. (ET) by agreement of the parties

Objections/Responses Received:

- A. J.P. Morgan Securities LLC's Objection to Motion to Compel and Cross-Motion to Stay Rule 2004 Discovery Relating to the Adversary Proceeding Pending Resolution of Motions on the Pleadings Therein [[Docket No. 8402](#) – filed December 13, 2022]
- B. Objection of Paulson & Co., Inc. and Joinder in Objection of J.P. Morgan Securities LLC to Opioid Master Disbursement Trust II's Motion to Compel Production Pursuant to Subpoena and Document Requests [[Docket No. 8403](#) – filed December 13, 2022]

Related Documents:

- i. Opioid Master Disbursement Trust II's (I) Reply in (A) Support of Motions to Compel Production Pursuant to Subpoena and Document Requests and (B) Response to Objections Thereto and (II) Objection to Cross-Motions to Stay Discovery [[Docket No. 8427](#) – filed December 15, 2022]

Status: A hearing with respect to this matter will go forward.

4. Opioid Master Disbursement Trust II's Motion to Compel Production Pursuant to Subpoena and Document Requests [related to The Goldman Sachs Group, Inc., The Goldman Sachs Group, L.P., Goldman Sachs Asset Management, L.P., and their affiliates] [[Docket No. 8380](#) – filed November 18, 2022]

Objection/Response Deadline: December 2, 2022 at 4:00 p.m. (ET); extended to December 13, 2022 at 4:00 p.m. (ET) by agreement of the parties

Objections/Responses Received:

- A. Goldman Sachs Group, Inc.'s, Goldman Sachs Asset Management, L.P.'s, and Goldman Sachs Group L.P.'s Objection to Motion to Compel and Cross-Motion to Stay Rule 2004 Discovery Relating to Adversary Proceeding Pending Resolution of Motions on the Pleadings [[Docket No. 8401](#) – filed December 13, 2022]

Related Documents:

- i. Opioid Master Disbursement Trust II's (I) Reply in (A) Support of Motions to Compel Production Pursuant to Subpoena and Document Requests and (B) Response to Objections Thereto and (II) Objection to Cross-Motions to Stay Discovery [[Docket No. 8427](#) – filed December 15, 2022]

Status: A hearing with respect to this matter will go forward.

5. Opioid Master Disbursement Trust II's Motion to Compel Production Pursuant to Subpoena and Document Requests [related to Morgan Stanley & Co. LLC, Morgan Stanley, Investment Banking and Brokerage Investments] [[Docket No. 8388](#) – filed December 6, 2022]

Objection/Response Deadline: December 13, 2022 at 4:00 p.m. (ET)

Objections/Responses Received:

- A. Morgan Stanley's Joinder and Additional Arguments in Opposition to the Opioid Master Disbursement Trust II's Motion to Compel Production Pursuant to Subpoena and Document Requests [[Docket No. 8400](#) – filed December 13, 2022]

Related Documents:

- i. Opioid Master Disbursement Trust II's (I) Reply in (A) Support of Motions to Compel Production Pursuant to Subpoena and Document Requests and (B) Response to Objections Thereto and (II) Objection to Cross-Motions to Stay Discovery [[Docket No. 8427](#) – filed December 15, 2022]

Status: A hearing with respect to this matter will go forward.

6. Goldman Sachs Group, Inc.'s, Goldman Sachs Asset Management, L.P.'s, and Goldman Sachs Group L.P.'s Objection to Motion to Compel and Cross-Motion to Stay Rule 2004 Discovery Relating to Adversary Proceeding Pending Resolution of Motions on the Pleadings [[Docket No. 8401](#) – filed December 13, 2022]

Objection/Response Deadline: December 19, 2022 at 12:00 noon (ET)

Objections/Responses Received: None at this time.

Related Documents:

- i. Motion to Shorten Notice and Set Schedule [[Docket No. 8418](#) – filed December 14, 2022]
- ii. Opioid Master Disbursement Trust II's (I) Reply in (A) Support of Motions to Compel Production Pursuant to Subpoena and Document Requests and (B) Response to Objections Thereto and (II) Objection to Cross-Motions to Stay Discovery [[Docket No. 8427](#) – filed December 15, 2022]
- iii. Order Shortening Notice and Setting Schedule [[Docket No. 8428](#) – entered December 16, 2022]

Status: A hearing with respect to this matter will go forward.

7. J.P. Morgan Securities LLC's Objection to Motion to Compel and Cross-Motion to Stay Rule 2004 Discovery Relating to the Adversary Proceeding Pending Resolution of Motions on the Pleadings Therein [[Docket No. 8402](#) – filed December 13, 2022]

Objection/Response Deadline: December 19, 2022 at 12:00 noon (ET)

Objections/Responses Received: None at this time.

Related Documents:

- i. Objection of Paulson & Co., Inc. and Joinder in Objection of J.P. Morgan Securities LLC to Opioid Master Disbursement Trust II's Motion to Compel Production Pursuant to Subpoena and Document Requests [[Docket No. 8403](#) – filed December 13, 2022]

- ii. Motion to Shorten Notice and Set Schedule [[Docket No. 8421](#) – filed December 14, 2022]
- iii. Opioid Master Disbursement Trust II’s (I) Reply in (A) Support of Motions to Compel Production Pursuant to Subpoena and Document Requests and (B) Response to Objections Thereto and (II) Objection to Cross-Motions to Stay Discovery [[Docket No. 8427](#) – filed December 15, 2022]
- iv. Order Shortening Notice and Setting Schedule [[Docket No. 8429](#) – entered December 16, 2022]

Status: A hearing with respect to this matter will go forward.

IV. ADVERSARY STATUS CONFERENCE [ADV. CASE NO. 22-50435 (JTD)]:

- 8. Motion of the Opioid Master Disbursement Trust II for Entry of an Order Enlarging the Time to Effectuate Service of Process and Approving Preliminary Case Management Procedures [*Opioid Master Disbursement Trust II v. Argos Capital Appreciation Master Fund LP, et al.* – Adversary Case No. 22-50435 (JTD) – [Adv. Docket No. 20](#) – filed December 2, 2022] (the “Case Management Motion”)

Objection/Response Deadline: December 16, 2022

Objections /Responses Received:

- A. Limited Response of Defendants Barclays Capital Inc., Blackrock Institutional Trust Company, N.A. UK Branch, Blackrock International Limited, Citadel Securities LLC, D. E. Shaw Asymptote Portfolios, L.L.C., D. E. Shaw Valence Portfolios, L.L.C., G1 Execution Services, LLC, GF Trading LLC, GTS Securities, LLC, Jane Street Capital, LLC, Korea Investment Corporation, Latour Trading LLC, RIEF RMP LLC, RIEF Trading LLC, Rock Creek MB, LLC, Spire X Trading LLC, Susquehanna Securities, LLC, Tower Research Capital LLC, T. Rowe Price Associates, Inc., Simplex Trading LLC, HRT Financial LP, HRT Financial LP a/k/a HRT Financial LLC, HRT Execution Services LLC, HRT Execution Services, LLC a/k/a Sun Trading LLC, Jump Trading, LLC, Deutsche Bank AG, Merrill Lynch, Pierce, Fenner & Smith Incorporated, Virtu Americas LLC, Everpoint Associates LLC, and Paulson & Co., Inc. to the Motion of the Opioid Master Disbursement Trust II for Entry of an Order Enlarging the Time to Effectuate Service of Process and Approving Preliminary Case Management Procedures [*Opioid Master Disbursement Trust II v. Argos Capital Appreciation Master Fund LP, et al.* – Adversary Case No. 22-50435 (JTD) – [Adv. Docket No. 48](#) – filed December 16, 2022]**

- i. **Declaration of Ross E. Firsenbaum in Support of Defendants' Limited Response to Motion of the Opioid Master Disbursement Trust II for Entry of an Order Enlarging the Time to Effectuate Service of Process and Approving Preliminary Case Management Procedures [*Opioid Master Disbursement Trust II v. Argos Capital Appreciation Master Fund LP, et al.* – Adversary Case No. 22-50435 (JTD) – [Adv. Docket No. 49](#) – filed December 16, 2022]**

Related Documents:

- i. **Reply in Further Support of Motion of the Opioid Master Disbursement Trust II for Entry of an Order Enlarging the Time to Effectuate Service of Process and Approving Preliminary Case Management Procedures [*Opioid Master Disbursement Trust II v. Argos Capital Appreciation Master Fund LP, et al.* – Adversary Case No. 22-50435 (JTD) – [Adv. Docket No. 50](#)– filed December 18, 2022]**

Status: A scheduling conference will be held solely for the purpose of establishing a date and time to hear the Case Management Motion and any objections/responses thereto.

Dated: December 19, 2022

/s/ Amanda R. Steele

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